

**BROWN RUDNICK LLP**

David J. Molton, Esq.  
Steven D. Pohl, Esq. (admitted *pro hac vice*)  
7 Times Square  
New York, NY 10036  
Telephone: (212) 209-4800  
Facsimile: (212) 209-4801

*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X
	:
In re:	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors <sup>1</sup> .	: (Jointly Administered)
	:
-----	X

**THIRTY-EIGHTH MONTHLY FEE STATEMENT OF BROWN RUDNICK LLP  
AS CO-COUNSEL TO THE AD HOC COMMITTEE OF  
GOVERNMENTAL AND OTHER CONTINGENT LITIGATION CLAIMANTS  
FOR SERVICES AND REIMBURSEMENT OF EXPENSES INCURRED  
FOR THE PERIOD OF NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584) Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	Brown Rudnick LLP
<b>Authorized to Provide Professional Services to:</b>	The Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	December 2, 2019 [Docket No. 553]
<b>Period for which compensation and reimbursement are sought:</b>	November 1, 2022 through November 30, 2022
<b>Amount of Compensation sought as actual, reasonable, and necessary:</b>	\$4,905.50
<b>Current Fee Request</b>	\$3,924.40 (80% of \$4,905.50)
<b>Amount of Expense Reimbursement sought as actual, reasonable, and necessary:</b>	\$0.00
<b>Amount of Compensation and Expenses sought as allowed under the Interim Compensation Order</b>	\$3,924.40
<b>Total Fees and Expenses Inclusive of Holdback</b>	\$4,905.50
<b>This is a(n):</b> <input checked="" type="checkbox"/> Monthly Application <input type="checkbox"/> Interim Application <input type="checkbox"/> Final Application	

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals* [Docket No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Docket No. 529] (the "Interim Compensation Order"), Brown Rudnick LLP ("Brown Rudnick") Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Thirty-Eighth Monthly Fee Statement (the "Fee Statement") for the period of November 1, 2022 through and including November 30, 2022 (the "Statement Period").

**Itemization of Services Rendered and Disbursements Incurred**

Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period, with respect to each of the project categories. As reflected in Exhibit A, Brown Rudnick incurred \$4,905.50 in fees during the Statement Period. Pursuant to this Fee Statement, Brown Rudnick seeks reimbursement for 80% of such fees, totaling \$3,924.40.

Annexed hereto as **Exhibit B** is a chart of Brown Rudnick's professionals and paraprofessionals, including standard hourly rate for each attorney and paraprofessional who rendered services to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$888.78. The blended hourly rate of all paraprofessionals is \$435.00. A copy of the computer-generated time entries reflecting all time recorded, organized in project billing categories by Brown Rudnick is attached hereto as **Exhibit D**.

Annexed hereto as **Exhibit C** is a chart of necessary and out-of-pocket expenses incurred by Brown Rudnick in the amount of \$0.00 in connection with providing professional services during the Statement Period and a copy of the computer-generated list of expenses.

In accordance with the Fee Assumption Order, Brown Rudnick has separately recorded work performed relating to allocation of value among the Debtors' creditors (the "Allocation Fees"). To the best of its knowledge, Brown Rudnick has not included Allocation Fees in this Application. Pursuant to the Fee Assumption Order, Brown Rudnick may request intercreditor allocation fees through a separate application at a later date.

**Notice**

Brown Rudnick will provide notice of the Fee Statement in accordance with the Interim Compensation Order.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Fee Statement, serve via email, to the Notice Parties (as defined in the Interim Compensation Order), a written notice setting forth the precise nature of the objection and the amount at issue.

If an objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Brown Rudnick an amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue; it shall not be sufficient to simply object to all fees and expenses.

Dated: January 11, 2023

Respectfully submitted,

BROWN RUDNICK LLP

/s/ David J. Molton

David J. Molton

Steven D. Pohl (admitted *pro hac vice*)

Seven Times Square

New York, New York 10019

Telephone: (212) 209-4800

Facsimile: (212) 209-4801

E-mail: [dmolton@brownrudnick.com](mailto:dmolton@brownrudnick.com)

[spohl@brownrudnick.com](mailto:spohl@brownrudnick.com)

*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent Litigation  
Claimants*

**EXHIBIT A**

**SERVICES RENDERED BY  
BROWN RUDNICK LLP**

**COMMENCING NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

**Summary of Fees Task Code**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
002 Asset Analysis and Recovery	0.0	\$0.00
003 Assumption and Rejection of Leases and Contracts	0.0	\$0.00
004 Business Operations	0.0	\$0.00
005 Case Administration	0.4	\$174.00
007 Claims Analysis	0.0	\$0.00
008 Employment and Fee Applications	3.3	\$2,247.50
009 Emergency Financing	0.0	\$0.00
010 Litigation: Contested Matters and Adversary Proceedings	0.0	\$0.00
011 Meetings and Communication with Ad Hoc Committee & Creditors	0.0	\$0.00
014 Plan and Disclosure Statement	3.3	\$2,484.00
<b>Total</b>	<b>7.0</b>	<b>\$4,905.50</b>
20% Fee Holdback		<b>\$981.10</b>
80% of Fees		<b>\$3,924.40</b>
Plus Expenses		<b>\$0.00</b>
Requested Amount		<b>\$4,905.50</b>

**EXHIBIT B**

**SERVICES RENDERED BY BROWN RUDNICK LLP**

**COMMENCING NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

**Summary of Hours and Fees by Professional**

<b>Name of Professional</b>	<b>Position/Year Admitted to Practice/Department</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Steven D. Pohl	Partner 1989 Bankruptcy & Corporate Restructuring	\$1,450.00	1.5	\$2,175.00
Jane Motter	Associate 2021 Real Estate	\$565.00	2.6	\$1,469.00
Alexandra M. Deering	Paralegal Bankruptcy & Corporate Restructuring	\$435.00	2.9	\$1,261.50
<b>Total Fees Requested</b>			<b>7.0</b>	<b>\$4,905.50</b>

**EXHIBIT C**

**ACTUAL AND NECESSARY COSTS INCURRED BY  
BROWN RUDNICK LLP**

**COMMENCING NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

<b>EXPENSE</b>	<b>AMOUNT</b>
-	\$0.00
<b>Total Expenses</b>	<b>\$0.00</b>

**EXHIBIT D**

**Time Entries for Each Professional by Task Code (Invoice)**



**brownrudnick**

PURDUE PHARMA AD HOC COMMITTEE OF GOVERNMENTAL  
ENTITES  
ATTN: DAVID MOLTON  
BROWN RUDNICK  
7 TIMES SQUARE  
NEW YORK, NY 10036

Invoice 6952036  
Date Dec 12, 2022  
Client 035843

RE: PURDUE PHARMA AD HOC COMMITTEE OF  
GOVERNMENTAL ENTITES

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through November 30, 2022:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035843.0005	CASE ADMINISTRATION	174.00	0.00	174.00
035843.0008	EMPLOYMENT AND FEE APPLICATIONS	2,247.50	0.00	2,247.50
035843.0014	PLAN AND DISCLOSURE STATEMENT	2,484.00	0.00	2,484.00
<b>Total</b>		<b>4,905.50</b>	<b>0.00</b>	<b>4,905.50</b>

Total Current Fees	\$4,905.50
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$4,905.50</b>

**\*\*\*\*NEW REMITTANCE INSTRUCTIONS\*\*\*\***

Please note that our remittance instructions have changed.  
New remittance instructions are included on the remittance  
page of this invoice.  
Please update your records to reflect this change.

**brownrudnick**

PURDUE PHARMA AD HOC COMMITTEE OF GOVERNMENTAL  
ENTITIES  
ATTN: DAVID MOLTON  
BROWN RUDNICK  
7 TIMES SQUARE  
NEW YORK, NY 10036

Invoice 6952036  
Date Dec 12, 2022  
Client 035843

RE: CASE ADMINISTRATION

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through November 30, 2022:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035843.0005	CASE ADMINISTRATION	174.00	0.00	174.00
<b>Total</b>		<b>174.00</b>	<b>0.00</b>	<b>174.00</b>

Total Current Fees	\$174.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$174.00</b>



PURDUE PHARMA AD HOC COMMITTEE OF GOVERNMENTAL ENTITIES  
December 12, 2022

Invoice 6952036  
Page 3

RE: CASE ADMINISTRATION

#### TIME DETAIL

Date	Professional	Description	Hours	Value
11/09/22	DEERING	UPDATE CASE CALENDAR	0.40	174.00
<b>Total Hours and Fees</b>			<b>0.40</b>	<b>174.00</b>

#### TIME SUMMARY

Professional	Hours	Rate	Value
ALEXANDRA M. DEERING	0.40 hours at	435.00	174.00
<b>Total Fees</b>			<b>174.00</b>

**brownrudnick**

PURDUE PHARMA AD HOC COMMITTEE OF GOVERNMENTAL  
ENTITIES  
ATTN: DAVID MOLTON  
BROWN RUDNICK  
7 TIMES SQUARE  
NEW YORK, NY 10036

Invoice 6952036  
Date Dec 12, 2022  
Client 035843

RE: EMPLOYMENT AND FEE APPLICATIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through November 30, 2022:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035843.0008	EMPLOYMENT AND FEE APPLICATIONS	2,247.50	0.00	2,247.50
<b>Total</b>		<b>2,247.50</b>	<b>0.00</b>	<b>2,247.50</b>

Total Current Fees \$2,247.50

Total Current Costs \$0.00

**Total Invoice \$2,247.50**



PURDUE PHARMA AD HOC COMMITTEE OF GOVERNMENTAL ENTITIES  
December 12, 2022

Invoice 6952036  
Page 5

RE: EMPLOYMENT AND FEE APPLICATIONS

**TIME DETAIL**

Date	Professional	Description	Hours	Value
11/02/22	DEERING	FINALIZE AND FILE MONTHLY FEE STATEMENT (.4) AND SERVICE OF SAME (.3)	0.70	304.50
11/15/22	DEERING	REVIEW PROPOSED ORDER GRANTING 9TH INTERIM FEE APPLICATION	0.30	130.50
11/16/22	POHL	REVIEW MATERIAL AND ATTEND QUARTERLY FEE HEARING	0.80	1,160.00
11/30/22	DEERING	DRAFT OCTOBER MONTHLY FEE STATEMENT	1.50	652.50
<b>Total Hours and Fees</b>			<b>3.30</b>	<b>2,247.50</b>

**TIME SUMMARY**

Professional	Hours	Rate	Value
STEVEN POHL	0.80 hours at	1,450.00	1,160.00
ALEXANDRA M. DEERING	2.50 hours at	435.00	1,087.50
<b>Total Fees</b>			<b>2,247.50</b>

**brownrudnick**

PURDUE PHARMA AD HOC COMMITTEE OF GOVERNMENTAL  
ENTITIES  
ATTN: DAVID MOLTON  
BROWN RUDNICK  
7 TIMES SQUARE  
NEW YORK, NY 10036

Invoice 6952036  
Date Dec 12, 2022  
Client 035843

RE: PLAN AND DISCLOSURE STATEMENT

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through November 30, 2022:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035843.0014	PLAN AND DISCLOSURE STATEMENT	2,484.00	0.00	2,484.00
<b>Total</b>		<b>2,484.00</b>	<b>0.00</b>	<b>2,484.00</b>

Total Current Fees	\$2,484.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$2,484.00</b>



PURDUE PHARMA AD HOC COMMITTEE OF GOVERNMENTAL ENTITIES  
December 12, 2022

Invoice 6952036  
Page 7

RE: PLAN AND DISCLOSURE STATEMENT

#### TIME DETAIL

Date	Professional	Description	Hours	Value
11/02/22	POHL	REVIEW BUSINESS PLAN UPDATE	0.10	145.00
11/15/22	POHL	FTI UPDATE CORRESPONDENCE	0.10	145.00
11/16/22	MOTTER	ADMINISTRATIVE ATTENTION TO ADVANCE FUNDING ACCOUNTS	0.30	169.50
11/16/22	POHL	REVIEW FTI UPDATE (.1); COMMUNICATING RE PRE-FUNDING ACCOUNTS (.1)	0.20	290.00
11/17/22	MOTTER	ADMINISTRATIVE ATTENTION TO ADVANCE FUNDING ACCOUNTS	1.10	621.50
11/17/22	POHL	CALL RE ADVANCE FUNDING ESCROW	0.30	435.00
11/18/22	MOTTER	ADMINISTRATIVE ATTENTION TO ADVANCE FUNDING ACCOUNTS	0.40	226.00
11/28/22	MOTTER	ADMINISTRATIVE ATTENTION TO ADVANCE FUNDING ACCOUNTS	0.60	339.00
11/30/22	MOTTER	ADMINISTRATIVE ATTENTION TO ADVANCE FUNDING ACCOUNTS	0.20	113.00
<b>Total Hours and Fees</b>			<b>3.30</b>	<b>2,484.00</b>

#### TIME SUMMARY

Professional	Hours	Rate	Value
STEVEN POHL	0.70 hours at	1,450.00	1,015.00
JANE W. MOTTER	2.60 hours at	565.00	1,469.00
<b>Total Fees</b>			<b>2,484.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PURDUE PHARMA AD HOC COMMITTEE OF GOVERNMENTAL  
ENTITES  
ATTN: DAVID MOLTON  
BROWN RUDNICK  
7 TIMES SQUARE  
NEW YORK, NY 10036

Invoice 6952036  
Date Dec 12, 2022  
Client 035843

RE: PURDUE PHARMA AD HOC COMMITTEE OF  
GOVERNMENTAL ENTITES

Remittance 

---

**Balance Due: \$4,905.50**

---

To ensure proper credit to your account, please include this page with your payment.

**Remittance Address**

Brown Rudnick LLP  
P.O. Box 23079  
New York, NY 10087-3079

**Wire Instructions**

JP Morgan Chase  
270 Park Avenue  
New York, NY 10017  
ABA Number: 021000021  
SWIFT Code: CHASUS33

**For Credit To**

Brown Rudnick LLP Deposit Account  
Account Number: 760367067

**\*\*\*\*NEW REMITTANCE INSTRUCTIONS\*\*\*\***

Please note that our remittance instructions have changed.  
New remittance instructions are included on the remittance  
page of this invoice.

Please update your records to reflect this change.